

1 UNITED STATES DISTRICT COURT
2 CENTRAL DISTRICT OF CALIFORNIA
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4 MAY VANG, SHANI BURLEW, and all others
5 similarly situated,

6 Plaintiffs,

7 v.

8 BURLINGTON COAT FACTORY
9 WAREHOUSE CORPORATION, a New Jersey
10 corporation; BURLINGTON COAT FACTORY
11 OF CALIFORNIA, LLC, a California limited
12 liability company,

13 Defendants.

CASE NO. 09-CV-08061-CAS (JCx)

**STIPULATION AND PROPOSED ORDER
CLARIFYING SCOPE OF CLASS
RELEASE AS TO CLASS MEMBERS'
CLAIMS ARISING FROM THEIR
EMPLOYMENT AS STORE MANAGERS**

14 **IT IS HEREBY STIPULATED**, by and among Named Plaintiffs May Vang and Shani
15 Burlew on behalf of themselves and all others similarly situated and Defendants Burlington Coat
16 Factory Warehouse Corporation and Burlington Coat Factory of California, LLC, subject to the
17 approval of the Court, that Paragraph 29 ("Released Claims") of the Stipulation and Settlement
18 Agreement of Class Action Claims shall be clarified as follows and that the instant clarification shall
19 be incorporated into the Final Order and Judgment:

20 The "Released Claims" of Class Members employed as Store Managers arising from their
21 employment by Defendants in California during such times as they were employed as Store Managers
22 shall be limited to claims related to the alleged forfeiture of Management Recognition Days and/or
23 Personal Days, whether the claims are phrased as vacation pay or otherwise.

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NAMED PLAINTIFFS

Dated: 5/16/11


May Vang

Dated:

Shani Burlew

Dated:

THE SPIVAK LAW FIRM
LAW OFFICES OF SHAUN SETAREH
LAW OFFICES OF LOUIS BENOWITZ

By

David Spivak
Attorneys for Plaintiffs

Dated:

DEFENDANTS
BURLINGTON COAT FACTORY
WAREHOUSE CORP. AND BURLINGTON COAT
FACTORY OF CALIFORNIA, LLC

By

Paul C. Tang
General Counsel

Approved as to Form:

COUNSEL FOR DEFENDANTS
ORRICK, HERRINGTON & SUTCLIFFE, LLP

Dated:

By

Jessica R. Perry
Attorneys for Defendants

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NAMED PLAINTIFFS

Dated:

Dated: 5/18/11

Dated:

May Vang

Shani Burlew

THE SPIVAK LAW FIRM
LAW OFFICES OF SHAUN SETAREH
LAW OFFICES OF LOUIS BENOWITZ

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David Spivak
Attorneys for Plaintiffs

Dated:

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Attorneys for Defendants

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Dated:

May Vang

Dated:

Shani Burlew

Dated:

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LAW OFFICES OF SHAUN SETAREH
LAW OFFICES OF LOUIS BENOWITZ

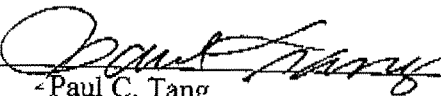
By

David Spivak
Attorneys for Plaintiffs

Dated:

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BURLINGTON COAT FACTORY
WAREHOUSE CORP. AND BURLINGTON COAT
FACTORY OF CALIFORNIA, LLC

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General Counsel

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Dated:

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Dated:

Shani Burlew

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LAW OFFICES OF SHAUN SETAREH
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Attorneys for Plaintiffs

Dated:

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FACTORY OF CALIFORNIA, LLC

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Approved as to Form:

COUNSEL FOR DEFENDANTS
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Dated:

May 18, 2011

By

Jessica R. Perry / s.c.
Jessica R. Perry
Attorneys for Defendants